

To the FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

I, John I Kuntz Amateur license holder of call KB9RYI submit the following comments in the matter of amending the part 97 of the Commissions Amateur Radio Rules to eliminate Morse Code testing requirements for ALL classes of Amateur Radio Licenses. My comments are in support of RM-10786.

To the commission:

I believe the technology of radio equipment has changed VERY much in the last few years. All of the reasons for requiring Morse code proficiency for Amateur Radio licensing have been eliminated.

I have learned, almost no government agency or commercial business uses Morse technology any more. This has been replaced by newer, faster, more efficient communication technologies. Because of the new technology available, there is no longer a need to maintain a pool of Morse trained operators. With the great many improvements in today's Amateur Radio equipment, and the availability and reasonable cost of that equipment there really does not appear to be any necessity to use Morse communications in Emergency Communications.

It seems to me that requiring Morse proficiency testing as a requirement for an Amateur Radio license is not aligned with the purpose of the Amateur Radio Service. Keeping the Morse testing requirement also appears to be contrary to some of the Commission's mandates.

Recently the IARU has recognized that requiring Morse proficiency is not in the best interest of maintaining the future of The Amateur Radio Service.

It is my understanding the only reason the Commission cited in its last review of the Part97 Rules to keep Morse testing was the ITU requirement. It was stated in WT Docket No. 98-143 that the public interest would be best served to change the Morse requirement to the minimum requirement of the ITU. The ITU minimum requirement NOW is for NO Morse testing requirement at all.

Now that the ITU requirement is for NO Morse testing I believe the Commission can and should act quickly to remove an unnecessary, restrictive requirement that has no valid reason to remain. I think it is time the Commission join the many Nations who already have eliminated the Morse test requirement.

I don't believe it is in the best public interest for the Commission to impose unnecessary burdens on those seeking a Commission-issued Amateur Radio License than would be faced by equally qualified applicants in other countries. This will unnecessarily limit the pool of available operators for Emergency Communications.

As ARES EC (Amateur Radio Emergency Services Emergency Coordinator) for Grant Co. Wisconsin it is very important to have as many trained Emergency Communicators as possible in the event of a natural disaster or another attack on our country. The elimination of the Morse testing for all Amateur Radio licensing will greatly expand the radio operators I have available for local and long distance Emergency Communications. In rural area like Southwest Wisconsin there are a limited number of Amateur operators to draw from. Having all licensed Amateur Radio operators able to operate on all Amateur frequencies will allow our ARES team to better serve the local public safety units in the event we are needed.

I believe the Commission by its own determinations as well as a large number of comments by the public from proceedings in both 1990 and 1999, as referenced in the NCI Petition, with out a doubt that Morse proficiency testing is not only unnecessary, it is undesirable in that:

It is not compatible with the basic purpose of the Amateur Radio Service.

It acts as a barrier to entry or advancement of otherwise qualified persons.

It is not any indication of an individual's ability to contribute to the advancement of the radio art.

It no longer continues to serve a regulatory purpose.

It does not in any way serve the public interest and necessity.

The Commission has the authority to amend its Part 97 rules to eliminate Morse proficiency testing requirements by its own order. It does not need any formal notice. It appears the only remaining reason for keeping the Morse testing for all Amateur Radio licenses has been eliminated by recent action by ITU.

By granting NCI's Petition a burden on applicants for Amateur Radio Licenses would be removed. No additional requirements would be imposed, and therefore no party or other person would be prejudiced by this action.

This would be a wise, correct and prudent decision on the Commissions part because: It is clearly within the Commission's authority. It would save considerable drain on the Commission's limited and valuable recourses in dealing with a matter that has debated extensively. It would remove an unnecessary, restrictive burden that the Commission has already determined is not compatible with the purpose of the Amateur Radio Service and serves no regulatory propose.

The commission should not combine NCI's request for prompt elimination of al Morse testing for all Amateur Radio Licenses, with any other petitions to avoid adding any unnecessary complications to what is a clear-cut issue.

I request the NCI petition be granted to eliminate all Morse testing for all Amateur Radio License's by Part97 rule change, which is within the Commissions authority.

Respectfully submitted by:

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